

EXHIBIT 456

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

- - -

IN RE: NATIONAL	:	
PRESCRIPTION	:	MDL No. 2804
OPIATE LITIGATION	:	
	:	Case No.
	:	1:17-MD-2804
THIS DOCUMENT RELATES	:	
TO ALL CASES	:	Hon. Dan A. Polster

- - -

Thursday, January 3, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

- - -

Videotaped deposition of JILL A. STRANG, held
at the offices of Cavitch, Familo & Durkin,
1300 East Ninth Street, Cleveland, Ohio, commencing at
8:57 a.m., on the above date, before Carol A. Kirk,
Registered Merit Reporter and Notary Public.

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<p style="text-align: right;">Page 146</p> <p>1 question was a little bit different.</p> <p>2 A. Okay.</p> <p>3 Q. We talked all about your six-week</p> <p>4 average report today, correct?</p> <p>5 A. Yes.</p> <p>6 Q. And the entire purpose of that</p> <p>7 report is to identify orders that are of an</p> <p>8 unusual or larger size than normal, correct?</p> <p>9 A. Greater than their six-week</p> <p>10 average, yes.</p> <p>11 Q. So the only thing showing up there</p> <p>12 is an order that's different than usual, right,</p> <p>13 and larger, specifically?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And correct me if I'm</p> <p>16 wrong, but you never did anything to investigate</p> <p>17 whether any of those orders were suspicious or</p> <p>18 related to diversion, correct?</p> <p>19 A. I treated them all as order errors</p> <p>20 before they left the distribution center.</p> <p>21 Q. So is that a "yes"?</p> <p>22 You never did any due diligence</p> <p>23 into anything that showed up on that six-week</p> <p>24 average report to determine whether those orders</p>	<p style="text-align: right;">Page 148</p> <p>1 and the order should be reported as suspicious."</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. And DDM never did that, correct?</p> <p>5 A. No.</p> <p>6 Q. Okay. But you're aware of -- I</p> <p>7 mean, it was pretty common for there to be</p> <p>8 orders that deviated from a normal pattern,</p> <p>9 because that's the whole purpose of that</p> <p>10 six-week average report, correct?</p> <p>11 A. Yes.</p> <p>12 Q. All right. If you go further down</p> <p>13 in the paragraph, about halfway down the middle,</p> <p>14 the sentence starts with, "The size of an order</p> <p>15 alone, whether or not it deviates from a normal</p> <p>16 pattern, is enough to trigger the registrant's</p> <p>17 responsibility to report the order as</p> <p>18 suspicious."</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. But that's not something</p> <p>22 that DDM ever did, correct?</p> <p>23 MR. JOHNSON: Objection.</p> <p>24 Go ahead.</p>
<p style="text-align: right;">Page 147</p> <p>1 were part of a diversionary scheme or were</p> <p>2 suspicious in any way, correct?</p> <p>3 MR. JOHNSON: Objection.</p> <p>4 Q. You can answer.</p> <p>5 A. Say that again. Sorry.</p> <p>6 Q. So you never did any due diligence</p> <p>7 or looked at anything -- strike that. That's</p> <p>8 what happens when you read your question back.</p> <p>9 When you had that six-week average</p> <p>10 report, if someone gave it to you, you never did</p> <p>11 anything to investigate whether those unusual or</p> <p>12 larger orders were part of some diversionary</p> <p>13 scheme, correct?</p> <p>14 MR. JOHNSON: Objection.</p> <p>15 A. Correct.</p> <p>16 Q. Because you saw them as potential</p> <p>17 order errors but you never considered that they</p> <p>18 could be suspicious, correct?</p> <p>19 MR. JOHNSON: Objection.</p> <p>20 A. Correct.</p> <p>21 Q. All right. If you look at the</p> <p>22 third sentence there, it says, "For example, if</p> <p>23 an order deviates substantially from a normal</p> <p>24 pattern, the size of the order does not matter</p>	<p style="text-align: right;">Page 149</p> <p>1 A. We did not consider them</p> <p>2 suspicious.</p> <p>3 Q. Okay. But this sentence says that</p> <p>4 a deviation in size of an order is enough to</p> <p>5 trigger the responsibility to report, correct?</p> <p>6 A. Correct.</p> <p>7 Q. But DDM never did that, right?</p> <p>8 A. Not based on the tools we were</p> <p>9 using, no.</p> <p>10 Q. And that's because your tools were</p> <p>11 not designed to identify suspicious orders</p> <p>12 before they were shipped, correct?</p> <p>13 MR. JOHNSON: Objection.</p> <p>14 A. They were to, again, create --</p> <p>15 create as a tool to use as a reason to</p> <p>16 investigate the history of the store, whether it</p> <p>17 was a controlled substance or not a controlled</p> <p>18 substance, to count as an order error before it</p> <p>19 left the distribution center.</p> <p>20 Q. Right. The tools that you had</p> <p>21 were designed to improve operational</p> <p>22 efficiencies, correct?</p> <p>23 A. Correct.</p> <p>24 Q. Not to identify suspicious orders</p>